

UNITED STATES DISTRICT COURT
District of Minnesota

18cr154 ADM/LIB

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2261A(2)(B)

18 U.S.C. § 2261(b)

v.

DESMOND GEORGE DANIAL,

Defendant.

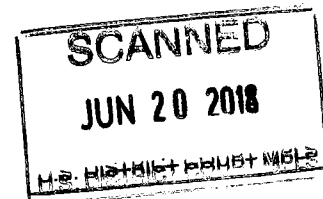
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Interstate Stalking)

From on or about August 5, 2014, through on or about March 20, 2018, in the State and District of Minnesota and elsewhere, defendant,

DESMOND GEORGE DANIAL,

with the intent to injure, harass, intimidate, and place under surveillance with intent to injure, harass, and intimidate another person, namely, Jane Doe, did use the mail, an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Jane Doe^{error} to wit: defendant used the mail, telephones and the Internet, among other things, to send harassing and threatening messages and images regarding Jane Doe, causing substantial emotional distress to Jane Doe,



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all in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON